

Stephanie L. Quinn, S.B. No. 216655
RANDOLPH, CREGGER, & CHALFANT
1030 G Street
Sacramento, CA 95814-0823
Telephone: (916) 443-4443
Facsimile: (916) 443-2124
E-mail: slq@randolphlaw.net

and

Patricia O. Kiscoan NE Bar #18624
UNION PACIFIC RAILROAD COMPANY
1400 Douglas Street, Mail Stop 1580
Omaha, NE 68179-1580
Telephone: (402) 544-6302
E-mail: pokiscoan@up.com
Appearance Pro Hac Vice

Attorneys for Respondent

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED TRANSPORTATION UNION,
NICK BJAZEVIICH, R.A. BRUCKER,
M.A. CERVANTEZ, B.W. HUMBLE, B.L.
HENRY, M.S. REDMOND, K.L.
SUMMERS,

Petitioners,

vs.

UNION PACIFIC RAILROAD
CORPORATION,

Respondent.

CASE NO. 3:08CV03681- MMC

STIPULATION REGARDING
ENLARGEMENT OF TIME TO ANSWER
OR OTHERWISE RESPOND

Comes now the parties, Petitioners, United Transportation Union, Nick Bjazevich, R.A. Brucker, M.A. Cervantez, B.W. Humble, B.L. Henry, M.S. Redmond, and K.L. Summers, and the Respondent, Union Pacific Railroad Company ("Union Pacific"), and hereby stipulate to enlarge the time within which Union Pacific is required to answer or otherwise respond to the Petition to Enforce.

1 Respondent seeks the additional time to work on resolving the dispute, or in the
2 alternative, to prepare a motion to dismiss. The Petitioners have no objection to the
3 enlargement of time. According,

4 The parties stipulate that the Respondent may file its Answer or otherwise respond
5 to the Petition to Enforce on or before Tuesday, September 30, 2008.

6 Dated this 25th day of August, 2008.

7 Respectfully submitted,

8
9 /s/ Stephanie L. Quinn
10 RANDOLPH, CREGGER, & CHALFANT
11 1030 G Street
12 Sacramento, CA 95814-0823
Telephone: (916) 443-4443
Facsimile: (916) 443-2124

13 /s/ Patricia O. Kiscoan
14 UNION PACIFIC RAILROAD COMPANY
15 1400 Douglas Street, Mail Stop 1580
Omaha, NE 68179-1580
Telephone: (402) 544-6302

16 Attorneys for Union Pacific Railroad Company

17
18 /s/ Frederick L. Nelson
19 HILDEBRAND, McLEOD & NELSON, INC.
20 350 Frank H. Ogawa Plaza, Fourth Floor
Oakland, CA 94612
Telephone: (510) 451-6732

21 /s/ Kevin Brodar
22 Associate General Counsel
23 UNITED TRANSPORTATION UNION
24 14600 Detroit Avenue
Cleveland, Ohio 44107
Telephone: (216) 228-9400

25 Attorneys for Petitioners
26 UNITED TRANSPORTATION UNION, NICK
27 BJAZEVICH, R.A. BRUCKER, M.A. CERVANTEZ,
28 B.W. HUMBLE, B.L. HENRY, M.S. REDMOND,
K.L. SUMMERS

PROOF OF SERVICE

CASE: United Transportation Union, etc. v. UP
NO: U. S. District Court, Northern District of California, No. 3:08cv03681-MMC

The undersigned declares:

I am a citizen of the United States and a resident of the County of Sacramento. I am over the age of 18 years and not a party to the within above-entitled action; my business address is 1030 G Street, Sacramento, CA 95814.

I am readily familiar with this law firm's practice for collection and processing of correspondence for mailing with the United States Postal Service; said correspondence will be deposited with the United States Postal Service the same day in the ordinary course of business.

On the date indicated below I served the within **STIPULATION REGARDING ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE RESPOND** on the following parties as addressed below by causing a true copy thereof to be placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail:

Attorneys for Petitioner
Frederick Lee Nelson, Esq.
HILDEBRAND, McLEOD & NELSON, INC.
350 Frank H. Ogawa Plaza, 4th Fl.
Oakland, CA 94612
(510) 451-6732

Kevin C. Brodar
Associate General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, OH 44107
(216) 228-9400
(216) 228-0937 (Fax)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this August 25, 2008 at Sacramento, California.

/s/ SUSAN R. DARMS
SUSAN R. DARMS